

REMARKS

In the April 9, 2004 Office Action, the Examiner noted that claims 2, 3, 5-7, 9, 10, 12-14, 18 and 19 were pending in the application and rejected claims 2, 3, 5-7, 9, 10, 12-14, 18 and 19 under 35 U.S.C. § 103(a). In rejecting the claims, U.S. Patents 5,627,877 to Penttonen 6,714,636 to Baiyor et al.; and 5,958,016 to Chang et al. (References A-C, respectively, in the April 9, 2004 Office Action) were cited. Claims 2, 3, 5-7, 9, 10, 12-14, 18 and 19 remain in the case. The Examiner's objections and rejections are traversed below.

Newly Cited Prior Art

U.S. Patent 6,714,636 to Baiyor et al.

The Baiyor et al. patent is directed to a system for subscriber control of timed and regional membership in multiple member termination groups for multiple leg telecommunication sessions in accordance with ANSI-41. Under the ANSI-41 specification, users may instruct that "an incoming call ... to a pilot or primary directory number ('DN') ... [be] branched into multiple, outgoing call legs to the parties or members of a predefined group, referred to as a flexible alerting group" (column 2, lines 20-23). According to Baiyor et al., "other secondary DNs may be alerted, such as DNs for members of the flexible alerting group who are 'on call', or for those members working evening, night, or weekend shifts" (column 5, lines 51-54). Also describe in Baiyor et al. is the prior art communication between mobile switching centers (MSCs) and from MSCs to the home location register (HLR) (see, column 10, lines 31-41).

Rejections under 35 U.S.C. § 103

In items 2-6 on pages 3-5 of the Office Action, claims 2, 5, 6, 7, 9, 12, 13, 14 and 18 were rejected under 35 U.S.C. § 103(a) as unpatentable over Penttonen in view of Baiyor et al. In making this rejection, the Examiner asserted that "Penttonen provides ... means for transmitting location information to the HLR, and further on to the VMS" (Office Action, page 4, lines 5-6) and particularly, "transferring data derived from an activity log to the VMS (col. 3, lines 5-8)" (Office Action, page 3, line 8). However, what is described at column 3, lines 5-8 of Penttonen is that the VMS daily checks the HLR using a MAP interface to determine the location of a subscriber. Nothing has been cited or found suggesting "generating at the information servers an activity log file including location data ... indicating which of the information servers provided access to the subscribers" (e.g., claim 5, lines 4-6) and then "transferring log data derived from

the activity log file from each of the information servers to the central management server" (claim 5, lines 11-12).

Apparently, the Examiner is asserting that the VMS taught by Penttonen corresponds to the central management server recited in the claims. If so, the VMS daily checking the HLR for the location of a subscriber does not meet the limitations quoted above, because to the extent that an "activity log" is created, the VMS creates it and thus, no "data derived from the activity log" could be sent to the VMS. If the VMS is viewed as corresponding to one of the information servers recited in the claims, then the only component of the system disclosed by Penttonen that could correspond to the central management server is the "ADMIN computer" (e.g., column 2, line 59). However, nothing has been cited or found suggesting that the ADMIN computer of Penttonen receives information based on the checking of the HLR by the VMS. Even if the information obtained by the VMS is passed on to the ADMIN computer, the present invention provides a benefit of more efficient processing of data by using an activity log maintained at the information servers, rather than adding to the processing performed by accessing an HLR.

Furthermore, the Examiner asserted that Penttonen disclosed "automatically performing analysis at the VMS (col. 3, lines 17-21)" (Office Action, page 3, line 9). It is submitted that the operation of "automatically performing pattern analysis at the central management server based on the location data" (claim 5, lines 13-14) requires more than what is described at column 3, lines 17-21 of Penttonen. This portion of Penttonen states that the "VMS, in which a subscriber belongs ... monitors the information about movements of the subscriber and upon concluding that the subscriber has moved ... into the area of some other MSC, it initiates a transfer of the subscriber to the new VMS." It is submitted that what is described in this quotation is not equivalent to and does not suggest "pattern analysis." Furthermore, as noted above, the monitoring of subscriber movements in Penttonen is not described as being performed at a component equivalent to the claimed central management server, but rather at a component that apparently corresponds to an information server in the claims. For the above reasons, it is submitted that claims 5 and 12, as well as claims 2, 6, 7, 9, 13, 14 and 18 which depend therefrom, patentably distinguish over Penttonen in view of Baiyor et al.

In items 7-8 on pages 5 and 6, claims 3 and 10 were rejected as unpatentable over Penttonen and Baiyor et al. in view of Chang et al. It is submitted that Chang et al. would add nothing to the combination of Penttonen and Baiyor et al. that would suggest to one of ordinary skill in the art performing a method as recited in claim 5 or storing instructions on a computer readable medium to perform such instructions. Therefore, it is submitted that claims 3 and 10

patentably distinguish over Penttonen, Baiyor et al. and Chang et al. for the reasons discussed above.

Summary

It is submitted that the references cited by the Examiner do not teach or suggest the features of the present claimed invention. Thus, it is submitted that claims 2, 3, 5-7, 9, 10, 12-14, 18 and 19 are in a condition suitable for allowance. Reconsideration of the claims and an early Notice of Allowance are earnestly solicited.

Finally, if there are any formal matters remaining after this response, the Examiner is requested to telephone the undersigned to attend to these matters.

If there are any additional fees associated with filing of this Amendment, please charge the same to our Deposit Account No. 19-3935.

Respectfully submitted,

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